

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SCANTEK MEDICAL INC.,

Plaintiff,

VS.

ANGELA CHEN SABELLA and ACCORDANT
HOLDINGS, LLC,

Defendants and Third-Party
Plaintiffs,

VS.

MINTZ & FRAADE, P.C., FRED MINTZ, ALAN FRAADE, MINTZ & FRAADE ENTERPRISES, LLC, ZSIGMOND L. SAGI, and GIBRALTAR GLOBAL MARKETING LLC.

Third-Party Defendants.

Defendants

[illegible]

I, Mark Stepniewski, being duly sworn, do depose and say, that:

1. I am not a party to this action and I am not an attorney.

2. I have had an attorney client relationship with Fred Mintz, Alan Fraade and their law firm for more than fifteen years. They have represented me in dozens of transactions and various matters over a period of more than ten years, including public and private securities offerings, corporate finance matters, consulting and other agreements, litigation, and personal legal matters.

3. I have also had an attorney client relationship with Ted Kramer for more than 15 years, and I believe I introduced him to Mintz & Fraade, P.C., for whom he is now counsel.

4. I have referred many individual and corporate clients to Fred and Alan for whom they have performed legal services, including Angela Chen Sabella and Accordant Holdings LLC.

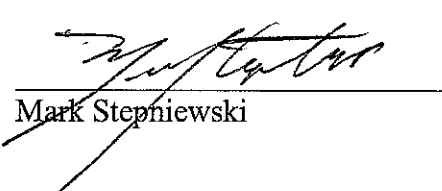
5. I have no interest in Accordant.

6. Fred introduced Ms. Sabella and me to Scantek Medical, Inc. and recommended an investment in Scantek. Ms. Sabella, Accordant and I relied on Fred and Alan to draft binding and enforceable documents and advise us of any risks or issues in connection with the enforceability of the securities being issued by Scantek. Based on the services performed by Fred and Alan no separate counsel was retained or used to review any Scantek documents or negotiate the investment by Ms. Sabella and Accordant.

7. I continued to have an attorney client relationship with Fred and Alan until December 2007 when Scantek filed a law suit against Ms. Sabella and Accordant trying to void the securities drafted by Alan and Fred.

8. On January 28, 2008 Fred Mintz sent an e-mail to a mutual client announcing that that our attorney-client relationship had been terminated. I believe that he sent similar letters to other persons.

9. I have reviewed affidavits submitted by Alan and Fred and Ted in this case and I am appalled with the cavalier and gratuitous manner in which they have ignored their duties to me as attorneys. Perhaps they have forgotten that they have a duty to maintain the confidentiality of our attorney-client communications. I have not. The affidavit of Ted Kramer dated March 28, 2008 (paragraphs 7 and 8) breaches this duty to me seven times. The affidavit of Alan Fraade dated March 28, 2008 (paragraphs 7 and 8) breaches this duty to me six times. The affidavit of Fred Mintz dated May 23, 2008 (paragraphs 3 and 4) breaches this duty to me twice.


Mark Stephiewski

Sworn to before me

This 20 day of June, 2008



Notary Public

KENNETH S. SUSSMANE
Notary Public, State of New York
No. 02SU6057419
Qualified in New York County
Commission Expires November 11, 20 11